REMARKS

I. Status of the Claims

Claims 1, 3-24 and 28-35 are pending in the application.

II. Summary of the Office Action and this Reply

The Examiner has rejected claims 1, 3-24 and 28-35 under 35 U.S.C. § 103(a), asserting that such claims are unpatentable over Japanese Patent Document No. 10-111873 ("Hida") in view of Japanese Patent Document No. 07/282079 ("Mizuno").

The Examiner has rejected claims 28 and 30 under 35 U.S.C. § 112. Claims 28 and 30 are amended herein for clarity in view of the rejection.

III. Discussion of the Cited Art

Japanese Patent Document No. 10-111873 (Hida)

Hida acknowledges that, in the prior art, it is possible to establish only one fixed link destination in an HTML file from a single hyperlink, the textual/graphical hyperlink being referred to in Hida as the "link object." See paragraphs 3, 5.

Hida discloses a link destination control system for an HTML file browser that seeks to automatically select the link destination, corresponding to conditions which, in turn, correspond to several link destinations in a link object for an HTML file browser. See Abstract. Accordingly, Hida describes the relationship between one link object in the HTML file, and several corresponding link destinations. Link conditions, which are described in separate files referenced by the browser, are used to select to one of several possible link destinations. See paragraphs 6, 7.

In addition to the link conditions, Hida requires either (1) a description in the link object corresponding part for the HTML file or (2) a description of the conditions which become the basis for selecting link destination using variable forms. See paragraph 7.

Japanese Patent Document No. 07/282079 (Mizuno)

Mizuno discloses presenting a list display as a pop-up menu in the vicinity of a node by reading information from a node table and a link table.

IV. Response to 103 Rejections

In paragraph 7 of the Action, the Examiner rejected claims 1, 3-24 and 28-35 under 35 U.S.C § 103(a) .

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Additionally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143.

As an initial matter, it is noted that the Action does not identify in detail the elements of the claims asserted to be taught or suggested by the cited art. Instead, the Action summarizes the cited art and provides a suggestion to "compare to" the quoted claim as a whole. The discussion below is responsive to what is believed to be intended. Clarification of any points believed in error is requested respectfully.

Claim 1

Independent claim 1 is directed to a method of operation of a client computer. Claim 1 recites "displaying, at the client computer, a multilink as a hyperlink, the multilink providing a logical point of access to a plurality of distinct files, each of the plurality of distinct files having a respective unique electronic address."

The Examiner relies of Hida as teaching this element. While Figure 2 of Hida shows an HTML file including two unique electronic addresses corresponding to a single hyperlink (between the SOMELINK tags), those links are not links to a plurality of distinct files. In other words, the linked files associated with the corresponding hyperlink are not distinct. Instead they are both the same file, namely the "joho2.htm" file. The only differences are the destination addresses from which the identical file is to be retrieved. See Figure 2, which identifies the same file at different destination addresses. In contrast, claim 1 requires that the hyperlink is a point of access to a plurality of distinct files (e.g. file1.htm, file2.jpg, file3.pdf). Accordingly, Hida teaches using a single link to retrieve a single file from one of several alternative destinations/storage locations, such that there is a one-to-one relationship between a hyperlink and a distinct file. In contrast, the claimed invention relates to using a single link to retrieve one of several distinct files, such that there is a one-to-many relationship between a hyperlink and distinct files. Accordingly, not all claim elements are taught or suggested by the cited art. For at least this reason, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Further, claim 1 recites "displaying, at the client computer, a multilink . . . each of the electronic addresses being associated with the multilink, each of the electronic addresses being contained in a file at the client computer . . . ." The Examiner asserts that this is taught by Hida.

Contrary to the Examiner's assertion, this is not taught or suggested by Hida. Hida discloses an HTML file that may include multiple electronic addresses, as shown in Figure 2. However, Hida does not disclose that such HTML file (see HTML file 6, Figure 1) exists at the client computer. Instead, Hida discloses that such HTML file 6 is read from the server holding the URL to the HTML file browser 1, which is resident at the client computer. See paragraph 10. Further, Hida states clearly that after the browser's processing, the hyperlink object is formed in an HTML file in which only one link destination (address) corresponds to the hyperlink. This is readily apparent from the descriptions of Figure 2 (which is a pre-processing state in which multiple addresses are associated with a hyperlink), and Figure 3 (which is a post-processing state in which only one address is associated with the hyperlink). This in emphasized in Hida, stating with respect to processing by the browser, that "the HTML file 6 which was newly acquired is not the former HTML file." Paragraph 12. Accordingly, although Hida teaches that multiple electronic addresses corresponding to a single hyperlink may appear in an HTML file, Hida does not teach that such multiple electronic addresses appear in the file that is at the client computer. Accordingly, not all claim elements are taught or suggested by the cited art. For at least this additional reason, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Further, claim 1 recites "generating a menu of options, at the client computer, in response to a user's selection of the multilink." The Examiner states that Hida does not teach generating a menu of options in response o the user's selection of the multilink. Applicants agree. However, the Examiner asserts that Mizuno provides such a teaching. Applicants respectfully traverse.

Mizuno discloses presenting a list display as a pop-up menu in the vicinity of a node by reading information from a node table and a link table. However, the pop up menu is displayed before the user's selection of the link. This is clearly stated in Mizuno at paragraph 57, in summary of the Effect of the Invention, as follows:

> The user can know the relationship with the link's destination node, before manipulating the link, by displaying the table of link-node relationships as a menu item.

In sharp contrast, claim 1 recites that the menu of options is generated in response to, i.e. after, a user's selection of the multilink. To modify Mizuno to arrive at the claimed invention would change the principle of operation of Mizuno and would destroy the intended, clearly stated effect of Mizuno's invention. Accordingly, not all claim elements are taught or suggested by the cited art. For at least this additional reason, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Claims 3-16

Claims 3-16 depend from claim 1 and are likewise patentable. In addition, claim 5 recites that the electronic addresses of the files are concatenated in a multilink URL, which is described in the application as distinct from a plurality of URLs. In contrast, Hida discloses only that a file may include multiple URLs. Neither Hida nor Mizuno teach or suggest a multilink URL. Accordingly, not all claim elements are taught or suggested by the cited art.

Further, claims 5-7 recite that the file contains the multilink URL, which means that the multiple electronic addresses are in the file that is present at the client

computer. Accordingly, these claims are patentable for reasons similar to those set forth above for claim 1.

With respect to claims 10-14 and the computer program for parsing the multilink URL, this is neither taught nor suggested by the cited art.

Claim 16 recites an embodiment in which a multilink is selectable to display a menu of selectable links, one of which is itself a multilink selectable to display a menu of selectable links. This is neither taught nor suggested by the cited art.

The Examiner's rejection with respect to claims 9 and 10 is unclear. Nevertheless, claims 8 - 14 depend from claim 1 and are likewise patentable.

Claims 17-24 and 28-35

Independent claims 17, 21, 28, 30 and 33 include recitations similar to those of claim 1. In particular, amended claims 17, 21 and 33 clarify that a plurality of distinct files are associated with a single multilink/hyperlink, and/or that these electronic addresses are contained in the file at the client computer that is interpretable to display the multilink. As discussed above, these features are neither taught nor suggested by the cited art. Claims 18-20, 22-24, 29, 31-32 and 34-35 depend from these claims and are likewise patentable.

Accordingly, reconsideration and withdrawal of the rejections of claims 17-24 and 28-35 are requested respectfully.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe claims 1, 3-24 and 28-35 to be patentable and the application in condition for allowance. Applicants respectfully request issuance of a Notice of Allowance. If any issues

remain, the undersigned requests a telephone interview prior to the issuance of an action.

Respectfully submitted,

Date: May 16, 2005

Gregory S. Bernabeo
Reg. No. 44,032

Synnestvedt & Lechner LLP
2600 Aramark Tower
1101 Market Street
Philadelphia, PA 19107
Telephone: (215) 923-4466
Facsimile: (215) 923-2189

M:\GBernabeo\Lucent\P22653-a.usa\Patoff\reply2-25-05.doc